



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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JUL 18 2011

Ref: 8EPR-N

Tamara Gertsch, Project Manager
Bureau of Land Management
Cedar City Field Office
176 East D.L. Sargent Drive
Cedar City, UT 84721

Re: Draft EIS Comments for the Sigurd to Red Butte No. 2
– 345 kilovolt Transmission Project, Utah
CEQ # 20110169

Dear Ms. Gertsch:

The U.S. Environmental Protection Agency Region 8 has reviewed the Draft Environmental Impact Statement (EIS) for the Sigurd to Red Butte No. 2 – 345 kilovolt Transmission Project (Project). This has been done in accordance with the EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Project Summary

The Draft EIS analyzes the impacts of granting right-of-way across federal lands to PacifiCorp (doing business as Rocky Mountain Power, the Proponent) for the purpose of constructing, operating and maintaining the Project. The Project includes the single-circuit, alternating-current, overhead transmission line, ancillary facilities and expansion of the existing Sigurd Substation on private land. It is located in Sevier, Millard, Beaver, Iron and Washington counties in Utah and covers a distance of approximately 160 miles. The Draft EIS analyzes several alternatives, including taking no action, and assesses the potential impacts on the natural, human and cultural environment for each of the alternatives. The Bureau of Land Management (BLM) would need to issue a right-of-way grant and the U.S. Forest Service (USFS) would need to issue a special-use permit for constructing, operating and maintaining the proposed transmission line and associated facilities. When completed, the Project would provide approximately 600 megawatts of electrical capacity to respond to anticipated load growth in southwestern Utah.

To facilitate screening and comparison of the transmission line alternative routes, the Project area was divided into two segments: a northern segment from the existing Sigurd Substation to the South Black Mountains area, and a southern segment from the South Black Mountains area to the existing Red Butte Substation near Central, Utah. There are six alternative routes in each of the northern and southern

segments.

Selection of the Agency Preferred Alternative in the Final EIS

The comparison of alternatives in the Draft EIS resulted in identifying both the Environmentally Preferred Alternative and the Proponent's Proposed Action. However, BLM intends to identify the Agency Preferred Alternative in the Final EIS, after the public has provided comments on the Draft EIS. The Environmentally Preferred Alternative parallels existing transmission lines for the majority of its alignment (134.0 miles out of 170.3 miles, or 79% of the alignment). Compared to other alternative alignments, it ranks highest in regard to the percentage of alignment that parallels existing transmission lines. The Proponent's Proposed Action, conversely, parallels existing transmission lines the least when compared to other alignment alternatives (50.2 miles out of 164.5 miles, or 31% of the alignment). In regard to environmental impacts, the Environmentally Preferred Alternative route has the lowest overall impact on the environment, while the Proponent's Proposed Action has the highest overall impact on the environment when compared to all alternatives. These alternatives are at each end of the spectrum in regard to anticipated environmental impacts, with the other alternatives falling somewhere in between. The EPA understands the importance of balancing an alternative's environmental impacts while also assuring system reliability (which can be negatively impacted by paralleling existing transmission lines in an area susceptible to outages due to potential for wildfires). We recommend that the Final EIS clearly disclose the reasoning behind the selection of an Agency Preferred Alternative based on the comparison of alternatives and key resource impacts.

Air Quality

The EPA is pleased with the air quality analysis initiated for the Project. Please consider the following suggestions for inclusion in the Final EIS:

- Page 3-13: For NEPA projects, disclosure of impacts are not typically based on significance levels. EPA recommends full disclosure of air impacts regardless of exceeding the significance impact levels on Table 3-8.
- Page 3-15: Table 3-7 Estimated Emissions of Criteria Pollutants. Please identify PM10 contribution to N6 Total Emissions of 2,486.8 tons per year. This emission rate appears to be substantially different than other emissions presented in Table 3-7 and an explanation should be presented in the Final EIS.
- Page 3-16 Table 3-8 Air Dispersion Modeling Results. NO2 1-hour impact analysis results should be presented. Typically, if a screening modeling method results in impacts above a level of concern, a more sophisticated modeling effort may be warranted. This would allow presentation of more refined results, or identify that a mitigation strategy may be warranted to reduce adverse impacts.
- Since the Project is located 14 miles from Zion and 55 miles from Bryce (page 3-6) we recommend the BLM disclose the air quality related values to these Class I areas.

Mitigation Measures

The mitigation measures outlined in the Draft EIS are comprehensive and well defined. It is understood that the Plan of Development (POD) will include fourteen supporting implementation documents. We appreciate that one of these documents, the Noxious Weed Management Plan, is based on principles and procedures from both the BLM Integrated Weed Management Manual 9015 and the USFS Noxious Weed Management Manual 2080, and addresses a key issue identified in our scoping letter dated February 5, 2010.

Dust particulates from construction have previously been identified in our scoping comments as a key issue which is of concern to the EPA. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers and others with respiratory illnesses. The EPA recommends that the POD supporting document addressing airborne dust impacts include mitigation measures and commitments in the Final EIS.

The Draft EIS has incorporated standard mitigation measures, including best management practices and design features associated with the construction, operation and maintenance of the Project. Selective mitigation measures beyond these standard mitigation measures have also been included in the Draft EIS. The document identifies that these measures would be warranted depending on environmental conditions, on a case-by-case basis. To reduce impacts associated with specific resource concerns (e.g., cultural, biological, visual resources) the Draft EIS identifies that the selected mitigation measures would be reviewed and refined through the NEPA process and development of the POD (to be completed before BLM and USFS RODs are signed). Depending on the Agency Preferred Alternative identified by BLM in the Final EIS and its specific resource concerns, the EPA recommends including the selective mitigation measures that would apply in the standard mitigation measures category.

Project Rating

In accordance with our responsibilities under the Clean Air Act Section 309, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. The EPA is rating each of the alternatives in the Draft EIS as "Environmental Concerns – Insufficient Information" (EC-2). The "EC" rating means that the EPA's review of the Draft EIS has identified potential impacts that should be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, alternatives or discussion that should be included in the Final EIS. Specifically, the EPA recommends additional disclosure of the selection of an Agency Preferred Alternative, air quality impacts and mitigation measures as outlined in this letter.

Thank you for the opportunity to provide comments on the Draft EIS. If you have any questions regarding our comments or this rating, please contact Suzanne Bohan, Deputy Director of the NEPA Compliance and Review Program at (303) 312-6925. You may also contact David Fronczak, lead reviewer for this project, at (303) 312-6096 or fronczak.david@epa.gov.

Sincerely,



Carol L. Campbell
Assistant Regional Administrator
Office of Ecosystems Protection
and Remediation

Enclosure: EPA's rating system

1. The first part of the paper discusses the importance of the research and the objectives of the study. It highlights the need for a comprehensive understanding of the subject matter and the role of the researcher in this process.

2. The second part of the paper focuses on the methodology used in the study. It details the research design, data collection methods, and the analytical techniques employed to interpret the findings. This section is crucial for ensuring the reliability and validity of the research results.

3. The third part of the paper presents the results of the study. It provides a detailed analysis of the data collected and discusses the implications of the findings. The results are presented in a clear and concise manner, allowing the reader to understand the key outcomes of the research.

4. The final part of the paper discusses the conclusions drawn from the study. It summarizes the main findings and provides recommendations for future research. This section is essential for highlighting the contributions of the study to the field and for guiding further investigations.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements**

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

